

**LAW OFFICES OF DALE K. GALIPO**

Dale K. Galipo (SBN 144074)  
Email: dalekgalipo@yahoo.com  
Hang D. Le (SBN 293450)  
Email: hlee@galipolaw.com  
21800 Burbank Blvd., Suite 310  
Woodland Hills, CA 91367  
Tel: (818) 347-3333  
Fax: (818) 347-4118

Attorneys for Plaintiffs  
L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her  
guardian *ad litem* Maria Cadena,  
individually and as successor-in-interest  
to Hector Puga; I.H., a minor by and  
through his guardian *ad litem* Jasmine  
Hernandez, individually and as  
successor-in-interest to Hector Puga;  
A.L., a minor by and through her  
guardian *ad litem* Lydia Lopez,  
individually and as successor-in-interest  
to Hector Puga; and ANTONIA SALAS  
UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISAIAH KEE;  
MICHAEL BLACKWOOD;  
BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
and DOES 6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

*Honorable Kenly Kiya Kato*

**EX PARTE APPLICATION FOR  
APPROVAL OF COMPROMISE OF  
THE MINOR PLAINTIFFS AND  
NOMINAL DEFENDANT'S  
CLAIMS**

[Declaration of Hang D. Le and  
Exhibits thereto; Declaration of Maria  
Cadena; Declaration of Jasmine  
Hernandez; Declaration of Lidia  
Lopez; Declaration of Linda Rangel;  
and Proposed Order *filed concurrently*]

**TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR  
COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that Plaintiffs L.C., by and through her guardian ad litem Maria Cadena, I.H., by and through his guardian ad litem Jasmine Hernandez, and A.L., by and through her guardian ad litem Lidia Lopez, individually and as successors in interest to Hector Puga, deceased, (“Minor Plaintiffs”) and Nominal Defendant S.S.C, by and through her guardian Linda Rangel, hereby move by way of this *Ex Parte* Application to Compromise of the Minor Plaintiffs and Nominal Defendants’ Claims for an order approving the settlement of Plaintiffs L.C., I.H., and A.L., and Nominal Defendant S.S.C.’s claims and distribution of their settlement funds.

Minor Plaintiffs and Nominal Defendant make this application pursuant to Central District Local Rule 7-19. The grounds for this application are set forth in the Memorandum of Points and Authorities, which follows below, and the Declaration of Hang D. Le, which is submitted concurrently herewith. Prior to filing this *ex parte* application, Plaintiffs’ counsel contacted Defendants State of California, Isaiah Kee, Bernardo Rubalcava, and Michael Blackwood’s (“State Defendants”) counsel, and County of San Bernardino, Robert Vaccari and Jake Adams’s (“County Defendants”) (altogether “Defendants”) counsel in compliance with Local Rule 19 through 7-19.1. State Defendants’ counsel is:

Rob Bonta  
Attorney General of California  
Norman D. Morrison  
Supervising Deputy Attorney General  
Diana Esquivel  
Deputy Attorney General  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550  
Telephone: (916) 210-7320  
Facsimile: (916) 322-8288  
Diana.Esquivel@doj.ca.gov

1 Declaration of Hang D. Le in Support of *Ex Parte* Application for Approval of the  
2 Compromise of the Minor Plaintiffs and Nominal Defendant's Claims ("Le Decl.")

3 ¶ 2.

4 County Defendants' counsel is:

Shannon L. Gustafson (SBN 228856)

sgustafson@lynberg.com

Amy R. Margolies (SBN 283471)

amargolies@lynberg.com

LYNBERG & WATKINS

A Professional Corporation

1100 W. Town & Country Road, Suite #1450

Orange, California 92868

(714) 937-1010 Telephone

(714) 937-1003 Facsimile

11 Declaration of Hang D. Le in Support of *Ex Parte* Application for Approval of the  
12 Compromise of the Minor Plaintiffs and Nominal Defendant's Claims ("Le Decl.")

13 ¶ 3. Counsel for State Defendants have reviewed the *Ex Parte* Application but have  
14 not had an opportunity to consult with their client regarding the contents and thus  
15 are unable to state a position regarding this Application. Le Decl. ¶ 4. Counsel for  
16 State Defendants have indicated that while State Defendants and counsel are  
17 generally in agreement with Plaintiffs' instant application for approval of the Minor  
18 Plaintiffs and Nominal Defendant's compromises and do not intend to oppose Minor  
19 Plaintiffs and Nominal Defendant's application for approval of the minor's  
20 compromises, counsel and State Defendants need additional time to review the  
21 contents of application and therefore are unable to agree to the approval of the  
22 minors' compromises at the time of this filing. Le Decl. ¶ 4. Counsel for County  
23 Defendants have also indicated that they need additional time to review the contents  
24 of the application and therefore are unable to agree to the approval of the minors'  
25 compromises at the time of this filing. Le Decl. ¶ 4.

26 Plaintiffs and Nominal Defendant seek approval of Minor Plaintiffs and  
27 Nominal Defendant's compromises on an *ex parte* basis because Minor Plaintiffs

1 and Nominal Defendant's respective guardians, after consulting with an annuity  
2 broker, have chosen annuities for which the interest rate may expire if this petition is  
3 heard as a regularly-noticed motion. Le Decl. ¶ 5. Filing this application for  
4 approval of Minor Plaintiffs and Nominal Defendant's claims as a regularly-noticed  
5 motion may cause a decrease in payment benefits to Minor Plaintiffs and Nominal  
6 Defendant. *Id.* Accordingly, Plaintiffs respectfully requests that this Court consider  
7 Plaintiffs' application for approval of the compromise of Minor Plaintiffs and  
8 Nominal Defendant's claims on an *ex parte* basis.

9  
10 Respectfully Submitted,

11  
12  
13 DATED: July 18, 2025

**LAW OFFICES OF DALE K. GALIPO**

14  
15 By /s/ Hang D. Le

16 Dale K. Galipo

17 Hang D. Le

18 Attorneys for Plaintiffs and Nominal  
19 Defendant  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

Maria Cadena, guardian ad litem for minor L.C., Jasmine Hernandez, guardian ad litem for minor I.H., Lidia Lopez, guardian ad litem for minor A.L., and Linda Rangel, guardian for minor S.S.C.<sup>1</sup>, hereby submit this *ex parte* application and proposed order for approval of the compromise of the claims of Minor Plaintiffs L.C., I.H., and A.L. and Nominal Defendant S.S.C. in this matter, and request that this Honorable Court approve of the proposed distribution of Minor Plaintiffs and Nominal Defendant's funds.

The instant claims of Minor Plaintiffs and Nominal Defendant arose out of the officer-involved shooting death of their father, Hector Puga ("Decedent") during an incident involving California Highway Patrol Officers Isaiah Kee, Bernardo Rubalcava, and Michael Blackwood, and County of San Bernardino Sheriff's Deputies Robert Vaccari and Jake Adams. Minor Plaintiffs and Nominal Defendant are Decedent's only biological children and his successors in interest. In addition to Minor Plaintiffs and Nominal Defendant, Decedent's mother Antonia Salas Ubaldo is also a plaintiff in this action.

Plaintiffs and County Defendants agreed to settle this case during a mediation held on April 1, 2025. The settlement was approved by the County Board on April

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<sup>1</sup> Federal Rule of Civil Procedure 17(c)(1) enumerates specific persons who may sue or defend on behalf of a minor, including a "general guardian," *i.e.*, a minor's custodial parent. *See J.F. v. San Diego Cnty. Unified Sch. Dist.*, No. 19-CV-2495-CAB-LL, 2020 WL 30435, at \*1 (S.D. Cal. Jan. 2, 2020); *Doe ex rel. Sisco v. Weed Union Elementary Sch. Dist.*, No. 2:13-CV-01145-GEB, 2013 WL 2666024, at \*1 (E.D. Cal. June 12, 2013). A guardian ad litem is appointed under Rule 17(c)(2) if a minor is not represented by one of the persons listed in 17(c)(1) or if the court finds that a conflict of interest exists between the parent and minor. *See* Fed. R. Civ. P. 17(c)(2); *T.H. v. O'Malley*, No. 24-CV-358 JLS (DDL), 2024 WL 1511964, at \*1 (S.D. Cal. Mar. 21, 2024). Linda Rangel is S.S.C.'s mother and "general guardian," does not have any adverse interest to S.S.C. in this action, and therefore may represent S.S.C. on her behalf. *See* Rangel Decl. ¶¶ 6-7.

1 29, 2025. The settlement agreement between County Defendants and Plaintiffs  
2 obligates County Defendants to pay Plaintiffs \$250,000. Le Decl. ¶ 6.

3 Plaintiffs and Nominal Defendant have agreed to split the settlement sum  
4 from County Defendants as follows:

5 \$50,000 to Plaintiff L.C. and her attorneys

6 \$50,000 to Plaintiff I.H. and his attorneys

7 \$50,000 to Plaintiff A.L. and her attorneys,

8 \$50,000 to Plaintiff Antonia Salas Ubaldo and her attorneys

9 \$50,000 to Nominal Defendant S.S.C. and her attorneys.

10 Le Decl. ¶ 6.

11 On May 5, 2025, the Court issued an Order Granting in Part and Denying in  
12 Part State Defendants' Motion for Summary Judgment. Specifically, the Court  
13 granted summary judgment on Plaintiffs' Fourteenth Amendment claim, which was  
14 being brought by all Plaintiffs. Because the Fourth Amendment claim was brought  
15 only by the Minor Plaintiffs and because Plaintiffs had conceded that Plaintiff  
16 Antonia Salas Ubaldo could not maintain state law claims against Defendants  
17 because she was not Decedent's successor in interest nor was she dependent on  
18 Decedent for financial support, Plaintiff Ubaldo was effectively dismissed from the  
19 case by the loss of the Fourteenth Amendment claim.

20 On May 22, 2025, State Defendants and the Minor Plaintiffs reached a settlement  
21 agreement. The settlement agreement obligates State Defendants to pay Minor  
22 Plaintiffs \$340,000. Le Decl. ¶ 7. Minor Plaintiffs and Nominal Defendants have  
23 agreed to split the settlement sum from State Defendants as follows:

24 \$85,000 to Plaintiff L.C. and her attorneys,

25 \$85,000 to Plaintiff I.H. and his attorneys,

26 \$85,000 to Plaintiff A.L. and her attorneys,

27 \$85,000 to Nominal Defendant S.S.C. and her attorneys.



1 Le Decl. ¶ 7.

2 **II. DISCUSSION**

3 District courts have a special duty, derived from Federal Rule of Civil  
4 Procedure 17(c), to safeguard the interests of litigants who are minors. In the context  
5 of proposed settlements in suits involving minors, this special duty requires a district  
6 “court [to] conduct its own inquiry to determine whether the settlement serves the  
7 best interests of the minor.” *Dacanay v. Mendoza*, 573 F.2d 1075, 1080 (9th Cir.  
8 1978); *see also Salmeron v. United States*, 724 F.2d 1357, 1363 (9th Cir. 1983)  
9 (holding that “a court must independently investigate and evaluate any compromise  
10 or settlement of a minor’s claims to assure itself that the minor’s interests are  
11 protected, even if the settlement has been recommended or negotiated by the  
12 minor’s parent or guardian ad litem.”).

13 Although the district court has a special duty to safeguard the interests  
14 of minor plaintiffs, that duty requires only that the district court  
15 determine whether the net amount distributed to each minor plaintiff  
16 in the proposed settlement is fair and reasonable, without regard to the  
17 proportion of the total settlement value designated for adult co-  
18 Plaintiffs and contracted by them with Plaintiffs’ counsel. If the net  
19 recovery of each minor plaintiff under the proposed settlement is fair  
20 and reasonable, the district court should approve the settlement as  
21 proposed.

22 *Robidoux v. Rosengren*, 638 F.3d 1177, 1179 (9th Cir. 2011).

23 California Code of Civil Procedure Section 372 and California Rules of  
24 Court, rule 3.1384 refer to the requirement of court approval and incorporate other  
25 rules requiring disclosure of various pertinent facts. California Rule of Court, rule  
26 3.1384 provides that “[a] petition for court approval of a compromise or covenant  
27 not to sue under Code of Civil Procedure Section 372 must comply with rules 7.950,  
7.951, and 7.952.” Pursuant to the above California rules, Minor Plaintiffs, Nominal  
Defendant and their attorneys make the following disclosures:

**Disclosures pursuant to California Rule of Court 7.950:**

1. The Petitioners are Maria Cadena, guardian ad litem for Minor Plaintiff L.C., Jasmine Hernandez, guardian ad litem for Minor Plaintiff I.H., Lidia Lopez, guardian ad litem for Minor Plaintiff A.L., and Linda Rangel, guardian for Nominal Defendant S.S.C. Petitioner Maria Cadena is the natural mother and legal guardian of L.C. Petitioner Jasmine Hernandez is the natural mother and legal guardian of I.H. Petitioner Lidia Lopez is the natural mother and legal guardian of A.L. Petitioner Linda Rangel is the natural mother and legal guardian of S.S.C.

2. Plaintiffs L.C., I.H., A.L., Antonia Salas Ubaldo, and Nominal Defendant S.S.C. are represented by the Law Offices of Dale K. Galipo.

3. Plaintiff L.C. is a minor child and the biological daughter of Decedent in this case, Hector Puga. The Minor Plaintiff L.C. is female. She was born in 2013.

4. Plaintiff I.H. is a minor child and the biological son of Decedent in this case, Hector Puga. The Minor Plaintiff I.H. is male. He was born in 2019.

5. Plaintiff A.L. is a minor child and the biological daughter of Decedent in this case, Hector Puga. The Minor Plaintiff A.L. is female. She was born in 2021.

6. Nominal Defendant S.S.C. is a minor child and the biological daughter of Decedent in this case, Hector Puga. The Nominal Defendant S.S.C. is female. She was born in 2019.

7. The nature of Minor Plaintiffs and Nominal Defendant's claims in this lawsuit are set forth in the operative complaint filed in this action. Pursuant to the settlement agreements, Minor Plaintiffs and Nominal Defendant's claims will be compromised without a trial on the merits of the claims. Le Decl. ¶ 8.

8. Minor Plaintiffs and Nominal Defendant's damages in this case arise from: (1) the injuries suffered by Decedent, for which Minor Plaintiffs and Nominal Defendant can recover damages as the successors in interest; and (2) Minor Plaintiffs and Nominal Defendant's individual loss of Decedent's comfort, care,

1 companionship, training, support, and guidance. Le Decl. ¶ 9.

2 9. Medical treatment and medical billing are not relevant. Minor Plaintiffs  
3 and Nominal Defendant have not received medical treatment in connection with this  
4 case.

5 10. The total amount of the settlement that County Defendants agree to pay  
6 is \$250,000. As set forth above, Plaintiffs and Nominal Defendant propose the  
7 following gross division: \$50,000 to Plaintiff L.C. and her attorneys; \$50,000 to  
8 Plaintiff I.H. and his attorneys; \$50,000 to Plaintiff A.L. and her attorneys; \$50,000  
9 to Plaintiff Antonia Salas Ubaldo and her attorneys; and \$50,000 to Nominal  
10 Defendant S.S.C. and her attorneys. Le Decl. ¶ 6.

11 11. The total amount of the settlement that State Defendants agree to pay is  
12 \$340,000. As set forth above, Minor Plaintiffs and Nominal Defendant propose the  
13 following gross division: \$85,000 to Plaintiff L.C. and her attorneys; \$85,000 to  
14 Plaintiff I.H. and his attorneys; \$85,000 to Plaintiff A.L. and her attorneys; and  
15 \$85,000 to Nominal Defendant S.S.C. and her attorneys. Le Decl. ¶ 7.

16 12. The total gross settlement amount the Minor Plaintiffs and Nominal  
17 Defendant will be getting from County Defendants and State Defendants combined  
18 is as follows: \$135,000 to Plaintiff L.C. and her attorneys; \$135,000 to Plaintiff I.H.  
19 and his attorneys; \$135,000 to Plaintiff A.L. and her attorneys; and \$135,000 to  
20 Nominal Defendant S.S.C. and her attorneys. Le Decl. ¶ 8.

21 13. Plaintiffs' and Nominal Defendant's attorneys—the Law Offices of  
22 Dale K. Galipo—are requesting attorneys' fees in the amount of forty (40) percent  
23 of the \$135,000 in gross settlement proceeds allocated to Plaintiff L.C., which is  
24 \$54,000; forty (40) percent of the \$135,000 in gross settlement proceeds allocated to  
25 Plaintiff I.H., which is \$54,000; forty (40) percent of the \$135,000 in gross  
26 settlement proceeds allocated to Plaintiff A.L., which is \$54,000; and forty (40)  
27 percent of the \$135,000 in gross settlement proceeds allocated to Nominal

1 Defendant S.S.C., which is \$54,000. The contingency retainer agreement between  
2 Minor Plaintiffs' respective guardian ad litem and Nominal Defendant's guardian  
3 and Plaintiffs' attorneys provide for a forty (40) percent contingency fee. Le Decl. ¶  
4 11.

5 Plaintiffs' and Nominal Defendant's attorneys are also requesting  
6 reimbursement of advanced litigation costs in the total amount of \$21,027.80. The  
7 costs will be split among the Plaintiffs and Nominal Defendant on a *pro rata* basis  
8 with their gross settlement allocation, such that Plaintiffs' and Nominal Defendant's  
9 attorneys are requesting \$4,836.39 in costs from the gross settlement proceeds  
10 allocated to Minor Plaintiff L.C., \$4,836.39 in costs from the gross settlement  
11 proceeds allocated to Minor Plaintiff I.H., \$4,836.39 in costs from the gross  
12 settlement proceeds allocated to Minor Plaintiff A.L., and \$4,836.39 in costs from  
13 the gross settlement proceeds allocated to Nominal Defendant S.S.C. Thus, the total  
14 amount Plaintiffs' and Nominal Defendant's attorneys seek in reimbursement for  
15 advanced litigation costs from Minor Plaintiffs and Nominal Defendant is  
16 \$19,342.56. Le Decl. ¶ 12.

17 These are the amounts that the Law Offices of Dale K. Galipo would be due  
18 under the existing contingency fee retainer agreements. This case involved a  
19 substantial amount of risk. If Plaintiffs and Nominal Defendant had prevailed at  
20 trial, statutory attorneys' fees due to Plaintiffs' and Nominal Defendant's attorneys  
21 under the retainer agreements could have exceeded \$1 million. If the Law Offices of  
22 Dale K. Galipo is not awarded a fully compensatory fee in such cases, it would not  
23 be able to take them. In turn, minor litigants such as Minor Plaintiffs and Nominal  
24 Defendant would not be able to attract competent counsel who could achieve similar  
25 results. Accordingly, Plaintiffs' and Nominal Defendant's attorneys request  
26 reimbursement the full amount of their attorneys' fees and costs. Le Decl. ¶ 13.

27 14. The share of these gross settlement proceeds apportioned for Minor

1 Plaintiff L.C. and her attorneys is \$135,000. After deducting requested attorneys'  
2 fees of \$54,000 and advanced costs in the amount of \$4,836.39, the total net  
3 settlement proceeds to Minor Plaintiff L.C. is \$76,163.61. The share of the gross  
4 settlement proceeds apportioned for Minor Plaintiff I.H. and his attorneys is  
5 \$135,000. After deducting requested attorneys' fees of \$54,000 and advanced costs  
6 in the amount of \$4,836.39, the total net settlement proceeds to Minor Plaintiff I.H.  
7 is \$76,163.61. The share of the gross settlement proceeds apportioned for Minor  
8 Plaintiff A.L. and her attorneys is \$135,000. After deducting requested attorneys'  
9 fees of \$54,000 and advanced costs in the amount of \$4,836.39, the total net  
10 settlement proceeds to Minor Plaintiff A.L. is \$76,163.61. The share of the gross  
11 settlement proceeds apportioned for Nominal Defendant S.S.C. and her attorneys is  
12 \$135,000. After deducting requested attorneys' fees of \$54,000 and advanced costs  
13 in the amount of \$4,836.39, the total net settlement proceeds to Nominal Defendant  
14 S.S.C. is \$76,163.61. Le Decl. ¶ 14.

15 15. It is requested that \$76,163.61 be used to fund a structured settlement  
16 annuity for Minor Plaintiff L.C. As part of the structured settlement, Petitioner  
17 Maria Cadena requests a lump sum payment on February 1, 2026. This payment  
18 would be used solely for L.C.'s care and benefit, including for the following  
19 purposes: assisting in the purchase of clothes and school supplies, assisting in  
20 school-related costs, and assisting in costs of extracurricular activities. . Le Decl. ¶  
21 15. Attached as "**Exhibit A**" to the Declaration of Hang D. Le is the proposed  
22 structured annuity for Minor Plaintiff L.C., which is incorporated herein by  
23 reference. The proposed annuity and disbursement schedule set forth in "**Exhibit A**"  
24 provides for a lump sum payment of \$7,000 on February 1, 2026 to L.C.'s guardian  
25 ad litem and legal guardian Maria Cadena. The total amount Plaintiff L.C. will  
26 receive after final payment is made directly to her is \$122,467.77. Le Decl. ¶ 15.

27 16. It is requested that \$76,163.61 be used to fund a structured settlement

1 annuity for Minor Plaintiff I.H. As part of the structured settlement, Petitioner  
2 Jasmine Hernandez requests a lump sum payment on February 1, 2026. This  
3 payment would be used solely for I.H.'s care and benefit, including for the  
4 following purposes: assisting in the purchase of clothes and school supplies,  
5 assisting in school-related costs, and assisting in costs of childcare. Le Decl. ¶ 16.  
6 Attached as "**Exhibit B**" to the Declaration of Hang D. Le is the proposed structured  
7 annuity for Minor Plaintiff I.H., which is incorporated herein by reference. The  
8 proposed annuity and disbursement schedule set forth in "Exhibit B" provides for a  
9 lump sum payment of \$8,500 on February 1, 2026 to I.H.'s guardian ad litem and  
10 legal guardian Jasmine Hernandez. The total amount Plaintiff I.H. will receive after  
11 final payment is made directly to him is \$168,381.74. Le Decl. ¶ 16.

12 17. It is requested that \$76,163.61 be used to fund a structured settlement  
13 annuity for Minor Plaintiff A.L. As part of the structured settlement, Petitioner Lidia  
14 Lopez requests a lump sum payment on February 1, 2026. This payment would be  
15 used solely for A.L.'s care and benefit, including for the following purposes:  
16 assisting in the purchase of clothes and school supplies, assisting in school-related  
17 costs, and assisting in costs of childcare. Le Decl. ¶ 17. Attached as "**Exhibit C**" to  
18 the Declaration of Hang D. Le is the proposed structured annuity for Minor Plaintiff  
19 A.L., which is incorporated herein by reference. The proposed annuity and  
20 disbursement schedule set forth in "Exhibit C" provides for a lump sum payment of  
21 \$10,000 on February 1, 2026 to A.L.'s guardian ad litem and legal guardian Lidia  
22 Lopez. The total amount Plaintiff A.L. will receive after final payment is made  
23 directly to her is \$178,677.81. Le Decl. ¶ 17.

24 18. It is requested that \$76,163.61 be used to fund a structured settlement  
25 annuity for Nominal Defendant S.S.C. Le Decl. ¶ 18. Attached as "**Exhibit D**" to  
26 the Declaration of Hang D. Le is the proposed structured annuity for Nominal  
27 Defendant S.S.C., which is incorporated herein by reference. The total amount

1 Plaintiff L.C. will receive after final payment is made directly to her is \$185,296.74.  
2 Le Decl. ¶ 18.

3 19. The moving guardians *ad litem*, Maria Cadena, Jasmine Hernandez,  
4 and Lidia Lopez, have no claims against Defendants in connection with the subject  
5 incident. The moving guardian, Linda Rangel, has no claims against Defendants in  
6 connection with the subject incident.

7 20. The moving guardians *ad litem* and guardian also do not have any  
8 claims against the Minor Plaintiffs or Nominal Defendant in connection with the  
9 subject incident.

10 21. California Welfare and Institutions Code Section 14124.73 does not  
11 apply.

12 22. This motion does not seek an order for payment of money to a special  
13 needs trust. Le Decl. ¶ 19.

14 **Disclosures pursuant to California Rule of Court 7.951:**

15 1. This application was prepared by attorney Hang D. Le (California State  
16 Bar Number 293450), of the Law Offices of Dale K. Galipo, located at 21800  
17 Burbank Boulevard, Suite 310, Woodland Hills, California, which represents all  
18 Plaintiffs and Nominal Defendant. Le Decl. ¶ 20.

19 2. The Law Offices of Dale K. Galipo did not become concerned with this  
20 matter at the instance of any party against whom the claim of said minors are  
21 asserted. Le Decl. ¶ 21.

22 3. The Law Offices of Dale K. Galipo represent Plaintiffs L.C., I.H., A.L.,  
23 and Antonia Salas Ubaldo and Nominal Defendant S.S.C. in this matter but are not  
24 employed by any other party or any insurance carrier involved in the matter. Le  
25 Decl. ¶ 22.

26 4. The Law Offices of Dale K. Galipo have not to date received any  
27 compensation for their services in connection herewith from any person. Le Decl. ¶



1 23.

2 5. In addition to receiving compensation from Minor Plaintiffs and  
3 Nominal Defendant's share of the settlement, Plaintiffs' and Nominal Defendant's  
4 attorneys expect to receive compensation for their services in connection herewith  
5 from the gross settlement proceeds allocated to the remaining adult plaintiff as  
6 follows: Plaintiffs' and Nominal Defendant's attorneys will receive \$20,000 in  
7 attorneys' fees and \$1,682.24 in reimbursement of advanced litigation costs from  
8 Antonia Salas Ubaldo's portion of the settlement. Le Decl. ¶ 24.

9 6. The Law Offices of Dale K. Galipo accepted this engagement for a  
10 contingency fee, plus reimbursement for any costs advanced. The retainer agreement  
11 provides for a 40 percent attorney fee recovery if any recovery is made after  
12 commencement of a lawsuit. Le Decl. ¶ 25.

13 **Petitioner's endorsement:**

14 Petitioner Maria Cadena, Jasmine Hernandez, Lidia Lopez, and Linda Rangel  
15 have made a careful and diligent inquiry and investigation to ascertain the facts  
16 relating to the incident giving rise to the minors' claims, the parties responsible for  
17 the incident, and the nature, extent and seriousness of the minors' claims. Petitioners  
18 further understand that if the compromise proposed in this *ex parte* application is  
19 approved by the Court and is consummated, the minor children will be forever  
20 barred from seeking any further recovery of compensation even though the minors'  
21 injuries and losses might in the future appear to be more serious than they are now  
22 thought to be. Petitioners recommend the compromise settlement and the proposed  
23 distribution to the minors to the Court as being fair, reasonable, and in the best  
24 interest of the minors, and requests that the Court approve this compromise  
25 settlement and make such other and further orders as may be just and reasonable.  
26 Petitioners requests that the Court enter the proposals attached to the Declaration of  
27 Hang D. Le as "**Exhibit A**", "**Exhibit B**", "**Exhibit C**," and "**Exhibit D**."



1 Specifically, Petitioners request that the Court enter the Proposed Order filed  
2 concurrently herewith.

3 **III. CONCLUSION**

4 For the foregoing reasons, Minor Plaintiffs and Nominal Defendant  
5 respectfully request that the Court enter the proposed order submitted.

6  
7 Respectfully Submitted,

8 DATED: July 18, 2025

**LAW OFFICES OF DALE K. GALIPO**

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10  
11 By /s/ Hang D. Le  
12 Dale K. Galipo  
13 Hang D. Le  
14 Attorneys for Plaintiffs  
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